

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**MOTION TO FILE
REPLY TO GOVERNMENT’S OPPOSITION TO DEFENDANT’S
THIRD MOTION FOR CHANGE OF VENUE UNDER SEAL**

Defendant’s Reply to the Government’s Opposition to Defendant’s Third Motion for Change of Venue cites examples of potential juror bias and prejudice addressed during both public and sidebar discussion and refers to arguments made to the Court in motions to strike jurors and the Court’s comments regarding the arguments, all of which are presently under seal. For that reason, and in an abundance of caution, the defendant files the fully Reply under seal, leaving it to the discretion of the Court whether it may be filed on the public docket. Counsel attach to this Motion a version of the Reply that redacts references to the questionnaires and sealed transcripts as well as references to the arguments and decisions on motions to strike.

Respectfully submitted,

DZHOKHAR TSARNAEV

By his attorneys

/s/ William W. Fick

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 30, 2015.

/s/ William W. Fick